

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SARA TAYLOR, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

KIN INSURANCE, INC.,

Defendant.

Case No. 1:25-cv-00213

Judge: Hon. April M. Perry

Hon. M. David Weisman

NOTICE OF MOTION

PLEASE TAKE NOTICE that, on **August 7, 2025 at 9:15 a.m. CT**, or as soon thereafter as counsel may be heard, the undersigned counsel for Defendant Kin Insurance, Inc. (“Defendant”) will appear before Honorable M. David Weisman, or any judge sitting in said judge’s stead, in Courtroom 1300 of the United States District Court for the Northern District of Illinois, located at the Everett McKinley Dirksen Building, in Chicago, Illinois, and will present Defendant’s **Motion to Amend Scheduling Order to Bifurcate Discovery**, a copy of which was previously and separately served upon you through the Court’s electronic filing system.

Dated: July 17, 2025

Respectfully submitted,

By: /s/ A. Paul Heeringa

A. Paul Heeringa (IL ARDC #6288233)
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Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that, on July 17, 2025, the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic docket.

/s/ A. Paul Heeringa
A. Paul Heeringa